

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195-SHS

Hon. Sidney H. Stein

**NOTICE OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

Pursuant to Rule 1.3(c) of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Christopher S. Sun, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, OpenAI Holdings, LLC in the above-captioned action.

I am a member in good standing of the bar of the State of California, and a certificate of good standing is attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached a declaration pursuant to Local Rule 1.3.

Respectfully submitted,

KEKER, VAN NEST & PETERS LLP

Dated: August 19, 2024

By: /s/ Christopher S. Sun

CHRISTOPHER S. SUN

633 Battery Street

San Francisco, CA 94111-1809

Telephone: 415 391 5400

Facsimile: 415 397 7188

csun@keker.com

Attorneys for Defendants OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI,  
LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
OPENAI HOLDINGS, LLC